



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

400 Seventh Street, S.W.  
Washington, D.C. 20590

FEB 18 2000

Mr. David J. Mashinski  
Transportation Safety and Regulations  
Shell Chemical Company  
910 Louisiana Street  
Houston, Texas 77002-2463

Ref. No. 99-0301

Dear Mr. Mashinski:

This responds to your letter of October 26, 1999, requesting clarification of the attendance requirements for unloading tank cars under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your letter describes a tank car steaming process during which vapors are vented through a valve that is connected via closed pipe to a permitted air pollution control device. You ask whether this process must be attended in accordance with § 174.67 of the HMR.

The answer is yes. During a tank car steaming process that is conducted with an open valve or manway, the tank car must be attended. However, when a tank car is connected to a steaming device that is not interconnected with or part of the unloading process or if the steaming process is conducted with all valves and manways closed, attendance is not required.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

Thomas G. Allan  
Senior Transportation Regulations Specialist  
Office of Hazardous Materials Standards



990301

17469



**Shell Chemicals**

Gorsley  
§ 174.67  
99-0301

October 26, 1999

Office of Hazardous Materials Standards – DHM-10  
U.S. Department Of Transportation  
400 7<sup>th</sup> Street, S.W.  
Washington, D.C. 20590-0001

Dear Mr. Mazzullo,

Shell Chemical Company seeks clarification of the scope of “unloading” in relation to tank cars, specifically the attendance requirement per 49CFR 174.67.

A tank car of a product with the proper shipping name of Flammable Liquid, Corrosive, NOS, and a packing group of II is being steamed for approximately 10 hours before the product is unloaded. During the steaming process the vapors are being vented through a valve in the car which is connected via a closed pipe to a permitted air pollution control device (flare).

We would appreciate your clarification in regards to the steaming process and whether this process is considered part of “unloading” in the circumstance stated above.

Our thanks in advance for your prompt consideration of this request.

I may be contacted at (713) 241-6436.

Shell Chemical Company  
910 Louisiana Street  
Houston, Texas 77002-2463

Sincerely,

David J. Mashinski  
Transportation Safety & Regulations